REMARKS

I. Administrative Overview

Claims 1, 3, 5, 6, 8, 9, 11, 12, and 14–16 were presented for examination, and these claims are rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 6,590,588 to Lincke et al. ("Lincke") and U.S. Patent No. 5,781,720 to Parker et al. ("Parker"). Also, claims 6, 12, and 16 are rejected under 35 U.S.C. § 112, second paragraph. Applicants hereby cancel claims 6, 12, and 16 without prejudice, traverse the rejections, present the following remarks, and request reconsideration. Claims 1, 3, 5, 8, 9, 11, 14, and 15 are pending after entry of this Response.

II. Amendment to Specification

The specification is hereby amended to correct a minor typographical error with regard to a reference number.

III. 35 U.S.C. §112, Second Paragraph

Claims 6, 12, and 16 are hereby canceled without prejudice and without agreeing with the position stated in the action in order to expedite prosecution.

IV. Lincke and Parker

Independent claim 1 recites, in part:

> generating on the computer an interactive control software object that provides an interactive graphical human-machine interface when operating on the handheld portable computing device to allow control of at least one parameter of a process by use of the handheld portable computing device.

Independent claim 8 recites, in part:

> a module that operates on a computer to allow a user of the computer to generate an interactive control software object that provides an interactive graphical human-machine interface when operating on a handheld portable computing device to allow control of at least one parameter of a process by use of the handheld portable computing device.

Independent claim 14 recites, in part:

> exchanging information between the computer and the handheld portable computing device, to control at least one parameter of the process by use of the interactive human-machine interface provided by operation of the object on the handheld portable computing device.

Applicants submit that Lincke does not teach or suggest at least these aspects of the pending claims.

In contrast, Lincke generally describes that a:

> wireless communications device and proxy server communicate with each other using a compressed transport protocol (CTP) built on top of IP. The goal of this protocol is to enable a user to fetch and display a web page on the wireless communications device with a one packet request sent to the proxy server.

(Col. 12, lines 9–14.) Lincke utilizes Compact Markup Language (CML) "in order to send web content to the wireless client." (Col. 22, ln. 31.) The

> CML is created dynamically at run-time by the proxy server using knowledge of the screen size and depth of the wireless client. Thus, the wireless client's very limited screen functionality will enable the proxy server to generate a much smaller CML representation than the proxy server could otherwise.

(Col. 22, lines 3–9.)

Applicants disagree with the characterization of Lincke in the Office action, and submit that Lincke fails to teach or suggest at least the portions of independent claims 1, 8, and 14 recited above.

Parker also fails to teach or suggest at least the recited-above portions of claims 1, 8, and 14. Given that both Lincke and Parker fail to teach or suggest at least these same aspects of the

claims, no combination of these two references could possibly have resulted in the inventions recited in independent claims 1, 8, and 14 or the claims that depend therefrom.

Furthermore, to establish a prima facie case of obviousness there must be some teaching, suggestion, or motivation, either in the references themselves or in the knowledge generally available in the art, to combine reference teachings. MPEP §706.02(j) and MPEP §2143.01. Applicants respectfully submit that there is no such teaching, suggestion, or motivation to combine Lincke and Parker, and thus Applicants submit that a prima facie case of obviousness has not been established and that the rejection must be withdrawn.

Parker is generally "directed at testing both new and revised computer application programs that use a Graphical User Interface (GUI)." (Col. 3, lines 66–67 to Col. 4, line 1.) Parker describes automatically generating:

> inputs to the GUI which simulate user events such as keyboard or mouse actions and then observes the changes to the GUI in response to the input.

(Col. 4, lns. 1–4.)

There is no teaching, suggestion, or motivation in Lincke to test computer programs by simulating user events or to simulate anything at all. Lincke is simply silent with regard to simulating anything. One of ordinary skill would not have looked from Lincke to Parker for the testing or simulating aspects of Parker.

There also is no teaching, suggestion, or motivation in Parker to modify anything in Lincke. Parker is silent with regard to any communication between a proxy server and a wireless client.

In short, Applicants submit that these two references are not properly combinable and that a prima facie case of obviousness has not been established.

CONCLUSION

In view of the foregoing, Applicants submit that all of the pending claims, (i.e., claims 1, 3, 5, 8, 9, 11, 14, and 15) are in condition for allowance. Accordingly, the Applicants request reconsideration, withdrawal of all grounds of rejection, and allowance of all of the pending claims in due course. If the Examiner believes that a telephone conversation with the Applicants' attorney would be helpful in expediting the allowance of this application, the Examiner is invited to call the undersigned attorney at the number identified below.

Regards,

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